NOTICE OF GOVERNMENT ENTITY CLAIM
Pursuant to A.R.S. § 12-821.01

November 5, 2025

Via Certified Mail and E-Mail
David K. Byers
Administrative Director
Arizona Administrative Office of the Courts
1501 W. Washington Street, Suite 411
Phoenix, AZ 85007

RE: Kristyn Anne Alcott
Date of Incident: Ongoing
Demand: $1

Dear Mr. Byers and Relevant Oversight Officials,

This correspondence constitutes a formal Notice of Claim pursuant to **A.R.S. § 12-821.01**, arising from the State of Arizona's continued appointment and use of Kristyn Alcott—an unlicensed individual operating under the name Family First Forensic Consultants LLC—in family court proceedings throughout the state. Ms. Alcott, despite lacking any behavioral health license issued by the Arizona Board of Behavioral Health Examiners, has repeatedly and falsely represented herself using the designation "BSW" and other professional titles. She has been permitted to engage in activities that statutorily require licensure, including but not limited to therapeutic intervention, parenting time supervision, social work, private investigation, and forensic reporting.

She is also listed on **multiple official Maricopa County government websites** as a ***"Parental Social Worker,"*** despite lacking any behavioral health or social work license issued by the Arizona Board of Behavioral Health Examiners. These listings and representations constitute material misrepresentation and fraudulent impersonation of a licensed professional under Arizona law.

Her participation in court proceedings has materially interfered with constitutionally protected interests in family integrity, procedural fairness, and due process, while simultaneously placing children and vulnerable families at risk.

I. Legal Position on Notice Requirement

I submit this Notice of Claim pursuant to **A.R.S. § 12-821.01**, not out of legal obligation, but out of moral necessity. As a witness to ongoing misconduct involving Kristyn Alcott—an individual who has repeatedly misrepresented her credentials and operated unlawfully within Arizona's family courts—I am compelled to place the State and its agencies on formal notice of the harm being inflicted upon vulnerable families and children.

In *Platt v. Moore*, 2021 WL 4516856 (9th Cir. Oct. 4, 2021), the Ninth Circuit held that Arizona's notice of claim statute does not apply to claims for nominal damages, such as the $1 sought here. The court reasoned that such claims, like declaratory relief, fall outside the financial and budgeting purposes of A.R.S. § 12-821.01. Nevertheless, I am providing this notice to give the State and its agencies ample opportunity to investigate and rectify ongoing constitutional violations before incurring exorbitant attorneys' fees and litigation costs.

I seek only $1 in nominal damages, along with injunctive relief and referral for criminal investigation.

II. Factual Allegations

Ms. Alcott has publicly and repeatedly identified herself using titles that falsely imply licensure, clinical authority, and judicial endorsement, including but not limited to:

- "Social Worker"
- "Child Welfare Case Manager"
- "Therapeutic Interventionist"
- "Forensic Parenting Time Supervisor"
- "Parental Social Worker"
- "Forensic Clinical Social Worker"
- "Case Implementation Supervisor"
- "Parenting Coordinator"
- "Rule 81 Implementation Supervisor"

None of these titles are supported by verified licensure, academic credentials, or statutory authority. The use of "BSW" and "Forensic Clinical Social Worker" is particularly egregious, as it implies formal behavioral health training and legal admissibility in forensic contexts—both of which she demonstrably lacks. The title "Rule 81 Implementation Supervisor" falsely suggests formal appointment under Arizona Rule of Family Law Procedure 81, despite her lack of training conferring such a role.

Ms. Alcott has also knowingly and intentionally misinformed judges, attorneys, and families that ADA providers are unnecessary during supervised visitation because she is qualified to handle special needs children—a claim made without any legal or professional basis.

Ms. Alcott has gained access to sensitive family court proceedings, influenced judicial outcomes, and extracted payment from families under false pretenses, in direct violation of Arizona law.

Despite these misrepresentations, Ms. Alcott continues to be appointed by Maricopa County judges, relied upon as an expert, and paid by court-ordered families. Numerous litigants who have questioned her qualifications have been penalized, held in contempt of court, or sanctioned, despite being victims of fraud. This pattern of retaliation and judicial protection has:

- Obstructed investigations by the Arizona Board of Behavioral Health
- Enabled ongoing consumer fraud and perjury
- Endangered children and families
- Perpetuated fraud on the court
- Violated the due process rights of litigants

The harm caused by Ms. Alcott is tremendous. Credible evidence and documented concern indicate that Kristyn Alcott's involvement in family court proceedings has directly contributed to the reunification of abused children with individuals credibly accused of sexual abuse, domestic violence, and other forms of harm—including, in some cases, alleged rapists. These outcomes have occurred despite warnings from parents, therapists, and mandated reporters, and in the absence of any verified clinical training or licensure on Ms. Alcott's part. Her recommendations have been treated as authoritative by the court, even when unsupported by evidence or contradicted by licensed professionals. The State's continued endorsement of her role has facilitated outcomes that place children in demonstrable danger, violate child protection standards, and expose the judiciary to

reputational and legal liability. This constitutes not only a failure of oversight, but a breach of the State's duty to protect vulnerable minors from foreseeable harm.

In one recent and deeply troubling case, Ms. Alcott is actively advocating for the reunification of children with a parent who has been the subject of substantiated findings of child sexual abuse and rape—confirmed by both the Department of Child Safety (DCS) and military investigative authorities. Despite these findings, Ms. Alcott has continued to push for reunification, asserting authority she does not possess and disregarding the safety and well-being of the children involved. Even more concerning, the judge presiding over the matter has deferred to Ms. Alcott's recommendations, despite her lack of licensure, clinical training, or legal standing to make such determinations. This conduct reflects a catastrophic failure of judicial discretion and oversight, and places children at immediate and unacceptable risk of further harm.

Furthermore, Ms. Alcott's fraudulent services impose substantial financial and procedural burdens on affected litigants. Once Ms. Alcott is removed from a case or recuses herself, families are often forced to expend significant time and resources to repair the damage she has caused. This includes retaining qualified professionals to re-evaluate children, reconstructing evidentiary records, filing corrective motions, holding new trials, and navigating delays in court proceedings. These costs are compounded by the fact that families were previously ordered to pay Ms. Alcott for services she was never legally authorized to provide. The State's continued endorsement of her role not only facilitates consumer fraud but also inflicts measurable economic harm on families already navigating high-conflict litigation.

Maricopa County and the State of Arizona have taken no corrective action despite years of repeated complaints. This constitutes a systemic failure to protect vulnerable children and families, and a knowing violation of clearly established constitutional rights, including:

- Substantive Due Process under the Fourteenth Amendment and Arizona Constitution Article II, § 4
- Procedural Due Process and the right to fair proceedings
- Equal Protection under the law
- The right to be free from state-sponsored fraud and unqualified interference in family integrity (*Troxel v. Granville*, 530 U.S. 57 (2000); *Santosky v. Kramer*, 455 U.S. 745 (1982))

No reasonable official could believe that appointing or retaining an unlicensed, misrepresenting individual in a role affecting custody and parental rights was lawful. The right to be free from such interference was clearly established at the time the misconduct occurred, defeating any claim of qualified immunity.

III. Breach of Privacy and HIPAA Concerns

It is further asserted that any individual who has been proven to engage in deliberate misrepresentation of professional credentials—specifically by posing as a licensed social worker—should not be entrusted with access to sensitive personal information of families and children. This includes, but is not limited to, financial records, medical histories, psychological evaluations, social security numbers, and other protected data.

Ms. Alcott's continued access to such information, despite her lack of licensure, history of dishonesty, and fraudulent scheme she is perpetuating through the family courts, constitutes a grave breach of privacy and a violation of ethical standards governing court-appointed professionals. If any of the information she accesses is protected health information (PHI) under the Health Insurance Portability and Accountability Act (HIPAA), her unauthorized handling of such data may constitute a federal violation. The State's failure to restrict her access reflects a systemic breakdown in safeguarding confidential information and exposes families to irreparable harm.

IV. Damage to Judicial Integrity

The continued use of Ms. Alcott as a court-appointed expert—despite her lack of licensure and repeated misrepresentations—has placed the Arizona judiciary in disrepute. It undermines the credibility of judicial proceedings, violates evidentiary standards, and erodes public trust. Numerous litigants who have questioned her qualifications have been penalized by admonishment, held in contempt of court, or sanctioned, despite being victims of fraud. This retaliatory pattern:

- Chills legitimate objections
- Obstructs due process
- Signals judicial complicity in misconduct
- Perpetuates endangerment and abuse of vulnerable families, including children

Regrettably, Ms. Alcott's conduct described herein implicates violations of state law, federal law, constitutional protections, and the ethical foundations of the judiciary itself. The continued use of Ms. Alcott as a court-appointed expert—despite her lack of licensure and repeated misrepresentations—has placed the Arizona judiciary in disrepute. It undermines the credibility of judicial proceedings, violates evidentiary standards, and erodes public trust. When an individual signs their name with credentials they do not possess and is permitted to commit perjury with impunity, they are not only committing perjury and fraud but also defrauding families who are ordered to pay for services under false pretenses.

The courts exist to protect the vulnerable, not to empower those who exploit them.

V. State Liability for Knowingly Endorsing False Expert Testimony

The State of Arizona bears direct legal responsibility for knowingly permitting Kristyn Alcott to testify in family court proceedings as an expert, despite her lack of licensure, history of misrepresentation, and repeated use of false credentials. Under Arizona Rules of Evidence 702, expert testimony is admissible only when the witness is qualified by knowledge, skill, experience, training, or education, and when their opinions are based on reliable methods and sufficient data. Ms. Alcott fails to meet these standards. Her testimony has been admitted in violation of Rule 702, resulting in improper judicial reliance and prejudicial outcomes.

The State's continued appointment and endorsement of Ms. Alcott—despite documented complaints, public warnings, and clear statutory violations—constitutes reckless disregard for evidentiary integrity and litigants' rights. This is not a passive oversight; it is affirmative conduct that places families in harm's way, especially when her recommendations have led to the reunification of children with abusive parents, including at least one case involving substantiated findings of rape and child sexual abuse.

This conduct satisfies the elements of the **state-created danger doctrine**, recognized under **42 U.S.C. § 1983**, which holds that a state actor may be liable when their actions place individuals in a position of danger they would not otherwise face, and the harm is foreseeable. The State's failure to vet, supervise, or disqualify Ms. Alcott—despite her fraudulent credentials and track record of dishonesty—has created a foreseeable and ongoing threat to children, families, and the integrity of the judicial system.

VI. Application of the State-Created Danger Doctrine

The facts outlined above give rise to liability under the **state-created danger doctrine**, a well-established exception to the general rule that the government has no constitutional duty to protect individuals from private harm. Under this doctrine, recognized in the Ninth Circuit and other federal jurisdictions, a state actor may be held liable under 42 U.S.C. § 1983 when their affirmative conduct places an individual in a position of danger that they would not otherwise have faced, and the harm is foreseeable.

Here, the State of Arizona—through its courts, administrative agencies, and judicial officers—has affirmatively created and perpetuated a dangerous condition by continuing to appoint and rely upon Kristyn Alcott in family court proceedings despite:

- Her lack of licensure or professional qualifications
- Her repeated misrepresentations and use of false credentials
- Her involvement in cases where children have been reunited with abusive parents, including one case involving substantiated findings of rape and child sexual abuse by both the Department of Child Safety and military investigators

By endorsing Ms. Alcott's role, granting her access to vulnerable families, and treating her unqualified recommendations as authoritative, the State has knowingly increased the risk of harm to children and parents. This includes reunification with abusive parents, unauthorized access to sensitive data, and the imposition of fraudulent services. This conduct is not merely negligent—it is affirmative state action that has created or exacerbated danger, satisfying the elements of the state-created danger doctrine. The State's failure to intervene, despite years of documented complaints and clear statutory violations, transforms passive inaction into active constitutional liability.

VII. Improper Extension of Quasi-Judicial Immunity

It is further alleged that the State of Arizona, through its judiciary, has improperly extended quasi-judicial immunity to Kristyn Alcott despite her lack of licensure, history of credential fraud, and conduct outside the scope of lawful appointment. Quasi-judicial immunity is a limited doctrine intended to protect qualified professionals who are lawfully appointed by the court and who act within

the bounds of their designated role. It does not shield individuals who engage in fraud, misrepresentation, or unauthorized practice.

Ms. Alcott has repeatedly presented herself using false titles—including "BSW," "Social Worker," and "Forensic Clinical Social Worker"—and has performed functions requiring licensure without legal authority. Her involvement in cases with substantiated findings of child sexual abuse, her unauthorized access to protected health information, and her influence over judicial outcomes despite lacking qualifications all fall outside the scope of any legitimate appointment. The court's continued reliance on her recommendations and its shielding of her from liability through quasi-judicial immunity constitutes a misuse of judicial authority and a violation of litigants' constitutional rights.

This misuse of immunity not only obstructs accountability but also reinforces the State's exposure under the **state-created danger doctrine** and **42 U.S.C. § 1983**, as it affirms and protects conduct that places children and families in foreseeable harm.

VIII. Procedural Abuse: Multiple Expert Roles Per Case

Ms. Alcott has been repeatedly appointed to serve in **multiple expert roles within the same family court case**, including combinations such as parenting time supervisor, therapeutic interventionist, investigator, and forensic evaluator. The Arizona Rules of Family Law Procedure require that expert appointments be narrowly tailored, justified, and free from duplication or conflict. Ms. Alcott's overlapping roles violate these principles and create undue influence over judicial outcomes. Her lack of licensure further disqualifies her from any expert designation. The State's continued endorsement of this role-stacking practice compounds its liability and reflects a systemic failure to enforce procedural safeguards.

IX. Alleged Participation in Patient Brokering and Insurance Fraud

It is further alleged that Kristyn Alcott is participating in a **patient brokering scheme under an alias**, wherein families involved in family court proceedings are referred to specific service providers or programs in exchange for financial kickbacks or other compensation. This conduct, if substantiated, constitutes **patient brokering**, **commercial exploitation**, and **insurance fraud**.

Under **A.R.S. § 20-463**, it is unlawful to knowingly present or cause to be presented false statements to an insurer, including misrepresentations related to claims, benefits, or services rendered. If Ms. Alcott is referring families to providers who then submit fraudulent insurance claims—such as billing for services that are unnecessary, unauthorized, or fraudulently induced—this implicates:

- Fraudulent billing practices
- False representation of medical necessity
- Kickback arrangements disguised as therapeutic referrals
- Use of court authority to compel participation in financially motivated schemes

Additionally, under **A.R.S. § 13-2310**, any scheme or artifice to defraud—including concealment of financial relationships, use of aliases, and misrepresentation of credentials—constitutes a criminal offense. The use of an alias to conceal these activities further underscores the deceptive nature of the operation and raises serious questions about the integrity of her appointments, her financial relationships with third-party providers, and the State's failure to investigate or intervene.

If the court is ordering families to use Ms. Alcott's services while she is simultaneously profiting from undisclosed referral arrangements, this constitutes a conflict of interest, abuse of judicial authority, and systemic exploitation of litigants. The State's continued endorsement of such conduct exposes it to liability under both state and federal law.

X. Formal Notice of Foreseeable Liability

This letter places the State of Arizona and its agencies on formal notice that continued inaction regarding Ms. Alcott's unlawful conduct will expose them to future litigation for actual damages by other victims. Should another litigant harmed by her unlicensed practice choose to sue, this Notice will serve as prima facie evidence that the State was aware of the misconduct and failed to act.

XI. Relief Requested

This claim may be resolved for $1.00 in nominal damages, along with the following non-monetary relief:

1. Immediate and permanent removal of Kristyn Alcott from all court-appointed roles statewide
2. Formal investigation and enforcement action by the Arizona Board of Behavioral Health Examiners
3. Referral for criminal investigation to the Arizona Attorney General and/or Maricopa County Attorney
4. Judicial review of all cases in which Alcott was appointed or relied upon
5. Public acknowledgment and corrective policy action by the AOC and Arizona Supreme Court
6. Preservation of all relevant evidence, including court orders, communications, and complaints

Please consider this letter a formal demand for injunctive relief and systemic correction. I certify that this Notice of Claim is submitted in good faith and with the intent to pursue injunctive relief with nominal damages. I reserve all rights to pursue further legal action, including claims under state and federal law, including 42 U.S.C. § 1983 if this matter is not resolved promptly.

Via Certified Mail and Electronic Submission

Arizona Attorney General
2005 N. Central Avenue
Phoenix, AZ 85004

Arizona Administrative Office of the Courts
1501 W. Washington Street
Phoenix, AZ 85007

Arizona Board of Behavioral Health Examiners
1740 W. Adams Street, Suite 3600
Phoenix, AZ 85007

Arizona Supreme Court
1501 W. Washington Street
Phoenix, AZ 85007

Maricopa County Superior Court
201 W. Jefferson Street
Phoenix, AZ 85003

Arizona Department of Child Safety
3003 N. Central Avenue
Phoenix, AZ 85012

Maricopa County Risk Management Department
301 West Jefferson Street, Suite 900
Phoenix, AZ 85003

Maricopa County Sheriff's Office
550 West Jackson Street
Phoenix, AZ 85003

Arizona Department of Insurance
100 N 15th Ave, Suite 261,
Phoenix, AZ 85007